LAW OFFICES

## STRANG, FLETCHER, CARRIGER, WALKER, HODGE, & SMITH, PLLC

CARLOS C. SMITH WILLIAM C. CARRIGER RICHARD T. HUDSON EWING STRANG LARRY L. CASH CHRISTINE MABE SCOTT \* J. ROBIN ROGERS # G. MICHAEL LUHOWIAK GREGORY D. WILLETT MARK W. SMITH

OF COUNSEL ROBERT KIRK WALKER FREDERICK L. HITCHCOCK

STEPHEN D. BARHAM

400 KRYSTAL BUILDING

REC'S TH ONE UNION SQUARE

CHATTANOOGA, TENNESSEE 37402-2514

TELEPHONE 423-265-2000

FACSIMILE 423-756 5861 June 3,  $2002^{-1}$ 

> OFFICE OF THE EXECUTIVE DECRETABLY

S. BARTOW STRANG 1882-1954

JOHN S. FLETCHER

1879-1961 JOHN S. CARRIGER

1902-1989 JOHN S. FLETCHER, JR. 1911-1974

> ALBERT L. HODGE 1910-1997

F. THORNTON STRANG 1920-1999

# ALSO LICENSED IN ALABAMA

## VIA FEDERAL EXPRESS

Mr. David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

Petition of Tennessee UNE-P Coalition to Open a Contested Case Proceeding to

Declare Switching an Unrestricted Unbundled Network Element,

Docket No. 02-00207

Dear Mr. Waddell:

Enclosed are Electric Power Board of Chattanooga's Responses to BellSouth's Discovery Request 1(e) and (f) and Request 2, which are being filed with the understanding that the responses are subject to the Protective Order filed by BellSouth Telecommunications, Inc., on May 24, 2002.

Copies are being submitted to Guy Hicks, Charles Welch, and Henry Walker who have signed the Protective Order.

Sincerely yours,

William C. Carriger

For the Firm

WCC:tm EPB/TEL - #123 Enclosures

cc:

Guy M. Hicks, Esq. Joelle J. Phillips, Esq. Henry Walker, Esq. Charles B. Welch, Jr., Esq. Andrew O. Isar, Esq.